

# Code of Conduct for Suppliers and Service Providers of the Thalia Group

Thalia is a medium-sized, independent family-owned company headquartered in Hagen, Germany, with additional service locations in Germany and Austria. As a successful omni-channel bookseller, Thalia creates a successful shopping experience for its customers via its sales companies - in bookstores and online. Thalia offers content in all available forms: from physical books to e-books and audiobooks.

At Thalia, we take very seriously the responsibility that Thalia bears as a company for complying with legal and ethical standards in its own business operations and in its supply chains.

Therefore, we also expect from our service providers, suppliers and their subcontractors:

- compliance with the obligations arising from the German "Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains" (*Lieferkettensorgfaltspflichtengesetz*), if and to the extent applicable.
- compliance with basic legal and ethical standards on human rights, working conditions and environmental aspects.

This Code of Conduct sets out the minimum standards, which service providers and suppliers must comply with in their cooperation with Thalia. It applies to all service providers and suppliers of Thalia Bücher GmbH and its affiliated companies (§§ 15 et seq. German Stock Corporation Act).

## I. Laws and ethical standards

At Thalia, we take compliance with ethical standards extremely serious and expect the same from our service providers and suppliers, as well as their providers. This also applies to compliance with applicable law.

## II. Human rights and fair working conditions

We expect our service providers and suppliers to recognize and value human rights. This includes in particular the commitment to the UN Guiding Principles on Business and Human Rights, the ten principles of the "UN Global Compact" and the labor and social standards of the ILO ("ILO Standards"). Within this framework, our service providers and suppliers must respect the dignity and personal rights of employees and all stakeholders in the supply chain.

### a. No Child Labor, Forced Labor or Other Illegal Labor

Service providers and suppliers will not tolerate child labor, forced labor, illegal labor or other involuntary labor.

If violations of these principles are identified, prompt corrective action shall be taken in the best interest of the children or employees affected.

#### **b. Compensation and working hours**

Working hours, including overtime, shall be in accordance with applicable national laws or ILO standards.

#### **c. Freedom of Association and Right to Collective Bargaining**

Service providers and suppliers shall respect the freedom of association and the right to collective bargaining.

#### **d. Diversity and Inclusion**

Every employee is treated with respect and dignity. Service providers and suppliers do not discriminate against anyone on the basis of gender, ethnic and national origin, skin color, religion, age, disability, sexual orientation or identity, or any other characteristic protected by law. The supplier also does not tolerate discrimination between employees.

#### **e. Occupational safety**

Service providers and suppliers create a safe and healthy working environment for their employees. Potential hazards are adequately assessed and eliminated through necessary protective measures. This includes using effective programs to improve the working environment, where appropriate, and taking all necessary precautions to prevent accidents and occupational diseases.

#### **f. Preservation of natural resources**

Service providers and suppliers must not deprive people of land, forests or waters whose use secures their livelihoods. They must refrain from damaging soil, polluting water and air, emitting noise, and using excessive amounts of water if this harms the health of persons, significantly impairs the natural basis for the production of food, or prevents persons from having access to safe drinking water or sanitary facilities.

#### **g. Protection of local communities**

Service providers and suppliers shall respect and value local communities and seek to prevent any negative physical, social and environmental impacts on such communities.

### **III. Ethical Business Conduct**

#### **a. Data protection**

We expect service providers and suppliers to ensure the careful handling of personal data. They comply with applicable laws and regulations on data protection, including the protection of personal data, e.g. the General Data Protection Regulation (GDPR).

#### **b. Bribery and corruption**

Service providers and suppliers comply with all applicable national and international anti-corruption laws and regulations. We expect service providers and suppliers to counter corruption and bribery and ensure that personal relationships do not impact business activities.

### **c. Fair competition**

We expect our service providers and suppliers to participate only in free competition and transparent markets and to act against unfair, non-transparent and restricted competition. Appropriate and necessary preventive measures are to be taken to ensure this.

## **IV. Compliance with the Code of Conduct for Service Providers and Suppliers.**

If a service provider or supplier fails to comply with any aspect of this Code of Conduct, it is expected to take immediate corrective action.

Thalia reserves the right to verify compliance with the requirements of this Code of Conduct, e.g. through self-assessments or audits (either conducted by Thalia itself or by neutral third parties).

Any violation of this Code of Conduct entitles the respective Thalia company to terminate the business relationship for cause.